



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

EJK:MPR
F. #2012R01666

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 25, 2014

By Email and ECF

Kevin Keating, Esq.
666 Old Country Road
Garden City, NY 11530

Re: United States v. Eduard Munteanu
Criminal Docket No. 12-698 (S-1) (SJF)

Dear Mr. Keating:

The government hereby provides notice, pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, that it intends to call Drug Enforcement Administration (“DEA”) Senior Supervisor and Special Agent Brian Fitzpatrick as an expert witness at trial in the above-referenced matter.¹ Specifically, the government intends to call Special Agent Fitzpatrick to testify as an expert regarding the interstate transportation of cocaine and the analysis, manufacture, price and distribution quantities of cocaine.

Special Agent Fitzpatrick is expected to testify that he has been employed by the DEA for over 20 years and that throughout his career he has received specialized training in, among other topics, the identification of narcotics and drug trafficking and has participated in hundreds of drug trafficking investigations. The government anticipates that Special Agent Fitzpatrick will testify regarding the retail value of the cocaine at issue in this case, and that the amount at issue is consistent with distribution rather than personal use. Special Agent Fitzpatrick will also testify about the methods of the transport of cocaine across international and state lines.

Special Agent Fitzpatrick has previously qualified as an expert and has testified in that capacity in the Eastern District of New York. Copies of some of his prior testimony will be provided to the defense in advance of trial pursuant to 18 U.S.C. § 3500.

¹ On or about December 18, 2012, the government provided you with notice of its intent to call an expert to testify regarding the narcotics seized in this case.

Keavin Keating, Esq.
February 25, 2014
Page 2

The government reserves the right to call additional expert witnesses and will notify you in a timely fashion if it intends to do so.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/Michael P. Robotti
Michael P. Robotti
Assistant U.S. Attorney
(718) 254-7576

cc: Clerk of Court (SJF) (by ECF)